

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on March 16, 2006.

Permit Number: **R30-03300001-2006**

Application Received: **April 15, 2009**

Plant Identification Number: **03300001**

Permittee: **GrafTech International Holdings Inc.**

Facility Name: **Anmoore Plant**

Mailing Address: **P.O. Box 2170, Clarksburg, WV 26302-2170**

Permit Action Number: MM03 Revised: *June 9, 2009*

Physical Location:	Anmore, Harrison County, West Virginia
UTM Coordinates:	560.92 km Easting • 4345.14 km Northing • Zone 17
Directions:	Rt 58, Philippi Pike at Anmoore, WV

Facility Description

GrafTech's Anmoore facility falls under the SIC code of 3624 for carbon and graphite products. This facility produces specialty carbon and graphite products by forming "green" carbonaceous shapes from raw materials consisting of petroleum coke and coal tar pitch. The "green" products are baked in natural gas fired, high temperature ovens and are then treated with liquid petroleum pitch and baked again prior to being processed into graphite using electrically heated furnaces. The graphite shapes are then purified, machined and processed into varying products which are further processed to enhance their properties prior to shipment.

SIC Codes: 3624 - Electronic and Other Electrical Equipment & Components – Carbon and Graphite Products.

Modification Description

GrafTech has historically utilized liquid petroleum pitch to impregnate carbon and graphite materials as a means to increase product densities. However, GrafTech has received notification from its supplier that liquid petroleum pitch would no longer be manufactured, and deliveries from existing inventories could not be guaranteed beyond March 2009.

Coal tar pitch was found to be a suitable replacement. The coal tar pitch is available as solid pellets. These pellets must be melted into a liquid form before utilization in the existing impregnation process equipment. One super sack (2000 pounds) will be used every eight hours.

Graftech is filing this Minor Modification Application to its Title V Air Operating Permit to install equipment necessary to melt solid coal tar pitch and to pump it into the existing liquid pitch impregnation system.

The following new equipment is to be installed:

1. Hoist to lift and move super sacks of pitch pellets.
2. Super sack lump breaker to break up congealed pitch inside the bags allowing the pitch to drop into the primary lump breaker.
3. Pitch lump breaker to break up congealed pitch into chunks no larger than one inch.
4. Transfer screw.
5. Pitch particle elevator.
6. Electrically heated, 4400 gallon capacity, pitch melter tank.
7. Pitch pump.

Emissions Summary

This modification is expected to result in the following potential emission changes:

Pollutant	PTE change, TPY
TSP	+0.16
PM ₁₀	+0.08
HAPs (POM)	See TSP Emission Rate Above

Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit 2,906 TPY of carbon monoxide (CO), 196 TPY of particulate matter (PM₁₀), 134 TPY of sulfur dioxide (SO₂). Due to the facility's potential to emit over 100 tons per year of criteria pollutant, GrafTech is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	PM from Manufacturing Operations
	45CSR13	Pre-construction Permits
	45CSR30	Operating permit requirement.

Each State and Federally-enforceable condition of the Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of

the Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

None

Determinations and Justifications

The additional emissions, as indicated in the Emissions Summary, will be vented through Emission Point (EP) 040, which is equipped with a control device. This increase in potential emissions will not cause the actual emissions of EP 040 to exceed the permitted limit of 32.2 lb/hr.

To clarify that the 32.2 lb/hr emission limit added to Section 6 of this permit is the same emission limit as previously indicated in Section 5, recordkeeping requirements from Section 5 were referenced in Section 6.

Non-Applicability Determinations

None

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: N/A
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Point of Contact

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Response to Comments (Statement of Basis)

N/A